

Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document (DPD)

Inspectors' matters, issues and questions (MIQs)

Stage 1 – Core Strategy

26 May 2017

Note: The MIQs for Stage 2 relating primarily to the Settlement Proposals Development Plan Document and 5 year supply of housing will be made available separately. Some cross-cutting issues relating to both plans will be considered in Stage 1.

Abbreviations:

ADM – additional minor modification proposed by the Council

CS – Core Strategy

Framework – National Planning Policy Framework

Regulations – The Town and Country Planning (Local Planning) (England) Regulations 2012

The Council` s answers are in italics with any suggested modifications in red italics

Matter 7: Housing for older people and to meet the needs of other different groups (Policy SP5)

Context: Para 50 and 159 of the Framework refer to LPAs planning for a mix of housing to meet the different groups in the community.

Main issues: Does the plan adequately address the needs of different groups in the community, including older people through Policy SP5? Have these accommodation needs been assessed and will the plan make appropriate provision for them?

Note: Affordable housing will be considered under Matter 10

Questions:

1. Does the local plan adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraphs 50 and 159 of NPPF)?

The Council believes that the Local Plan addresses the needs of all types of housing and the needs of different groups in the community. The Plan did not have an older persons housing policy in it originally, this matter being raised during the summer 2016 consultation as an oversight and was rectified with the creation of Policy SP5.

With regard to service families the Council met with the RAF concerning new housing on the 27th October 2015 but they did not wish any allocation to be made stating that growth at the Coningsby RAF base had reached its limit. With regard to people wishing to build their own homes, as at 23rd May 2017 there were 110 single housing plots with planning permission (not started) and 90 single plots with planning permission (started) in the District. Therefore, the ability to buy and build your own home in the District is considered high and therefore there is no need to set out a separate policy in this regard. The Council would as a matter of course support housing coming forward for disabled people or people with special needs.

2. Has the need for housing specifically to meet the needs of older people been established and, if so, should that need be set out in the plan?

The population of East Lindsey grows through the in migration of older persons with Lincolnshire and East Lindsey in total have a substantially older age profile than England, with 22% and 28% respectively, in the 65+ age-range, and a median age of 45–50. East Lindsey has an Old Age Dependency ratio of 49, compared to a national average for England of 27. This means that the 65+ population of East Lindsey is equivalent to 49% of the 15–64 age-group population, compared to just 27% across England in aggregate. Therefore the Council believes that there is a need for an older person's policy and the evidence for that need is established through the demographic of the population. The Local Plan states in several places including paragraph 4 of page 21 that the population is predominantly of older persons. The Plan could quantify that but the Council does not see any need to, considering that most of those coming into the District, come in to retire and either buy or rent a property and are the basis for the housing growth in the main which is already set out in the Plan.

3. Will Policy SP5 help ensure that the specific housing needs of older people are met?

The Council believes Policy SP5 will help ensure the specific housing needs of older people are met by providing a positive policy that supports the type of housing such as extra care and nursing homes that older people need.

4. Policy SP5 supports the provision of specialist housing for older people in Towns and Large Villages, including in the Coastal Zone. Is such housing appropriate in principle within the Coastal Zone?

The Council believes specialist housing for older persons in the Coastal Zone is appropriate in principle. To not support this type of housing would mean older persons who needs specialist housing would have to move, sometimes away from their families. The Environment Agency has supported the Council in the Local Plan in its approach concerning flood risk and housing growth and this includes this Policy.

5. Policy SP5 supports the provision of specialist housing for older people *only* in Towns and Large Villages. Is this justified? Why would it not be appropriate to provide for such for development in Medium and Small Villages?

The Council considers it inappropriate to support specialized housing for older persons in medium and small villages. These settlements do not have the services and facilities to support the occupiers of such developments, including access to medical services, regular bus services and the ability to walk to shops which would supply their full day to day needs. This could leave those who need care and find it difficult to go out isolated in the community. It would also disperse the provision of care to a wider pattern of settlements which would place an additional burden on health care providers.

6. Is the flood risk mitigation proposed in Policy SP5/final bullet justified? Are there any circumstances where ground floor sleeping accommodation would be justified?

The Council believes that specialised housing for older persons should provide appropriate flood mitigation and in the first instance demonstrate that there would be no ground floor sleeping accommodation. This is to ensure that if there was a flood event during the night (as happened in 2013 and 2017) residents would not be left in a vulnerable position and if the event occurred with no time for escape they would already be up on the higher floors away from any flood water. Ground floor sleeping accommodation could be justified if the developer could demonstrate that an appropriate level of warning and evacuation was going to be put in place but this would have to be on a case by case basis.

7. In SP5/final bullet, is it realistic to expect that all specialist housing for older people in the **coastal zone** will be occupied by those with a local need (eg for example in nursing and care homes and flats designed specifically for older people)? Will this have any effect on viability and deliverability? Is it the intention to apply the Local Connection Criteria in Annex 1 and, if so, is this justified?

It is realistic to expect all specialist housing for older persons in the Coastal Zone to be occupied by those already living in the Zone. It would appear from the question that the final bullet point of SP5 is not clear because the two examples set out are that the need appears to be coming from nursing homes and care homes and this is not actually what is meant by local need in this context. What is meant is the need will just come from those already living in the Coastal Zone who are older and need specialist housing with no reference to Annex 1. The Council has had discussions since the submission of the local plan with a provider of specialised older persons housing in the coast and they discussed the local need and felt it was applicable but it could be expanded to include those older persons with family in the coast who wanted specialised housing but near their family. The Council believes this is a reasonable approach and therefore the Council would suggest a modification adding onto the end of the last sentence of the final bullet point of the policy

....will be taken up by a local need that will come from those older persons already living in the Coastal Zone or older persons who have relatives living in the Coastal Zone where there is a need for them to come into the Zone for specialized housing near their families.

8. What is the justification for Policy SP5/3rd bullet which requires that 'development' should demonstrate how occupiers/users will work with other local providers of services for local people?

The 3rd bullet point of the policy is about asking developers to demonstrate that they have tried to work with other local providers of older persons services such as social services, Age UK etc. in order to improve the provision of services in the development for older persons.